

**JAMES KOUSOUROS**  
ATTORNEY AT LAW



260 Madison Avenue, 22nd floor • New York, NY 10016  
212•532•1934 / 212•532•1939 fax  
E-mail: James@kousouroslaw.com

JAMES KOUSOUROS  
FOUNDER & PRINCIPAL

ERIC GROSSFELD  
ASSOCIATE

EMMA J. COLE  
LEGAL ASSISTANT

May 19, 2020

**Via ECF**

Hon. Denise L. Cote  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007- 1312

**MEMO ENDORSED**

**Re: United States v. Danielle Burducea, 19-CR-086 (DLC)**

Dear Judge Cote,

This letter is respectfully submitted to request that the deadline to submit objections to the draft Presentence Report currently due May 20, 2020 be extended by two weeks.

Given the current pandemic and the recent birth of Ms. Burducea's daughter, we have been unable to review the draft report with Ms. Burducea. Thus, the requested extension will permit us to review the report with Ms. Burducea and file any objections on her behalf.

Assistant United States Attorney David Abramowicz and Probation Officer Jill Jefferies have no objection to the instant request.

Thank you for your courtesy and consideration.

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_


James Kousouros, Esq.

c.c.

David Abramowicz  
Assistant United States Attorney

Jill Jefferies  
United States Probation Officer

Granted. 5.20.2020.

  
\_\_\_\_\_  
DENISE COTE  
United States District Judge